

1 Justina K. Sessions, SBN 270914
2 WILSON SONSINI GOODRICH & ROSATI
3 Professional Corporation
4 One Market Plaza
5 Spear Tower, Suite 3300
6 San Francisco, California 94105
7 Telephone: (415) 947-2197
8 Facsimile: (415) 947-2099
9 Email: jsessions@wsgr.com

7 Jonathan M. Jacobson, New York SBN 1350495
8 WILSON SONSINI GOODRICH & ROSATI
9 Professional Corporation
10 1301 Avenue of the Americas, 40th Floor
11 New York, New York 10019
12 Telephone: (212) 497-7758
13 Facsimile: (212) 999-5899
14 Email: jjacobson@wsgr.com

12 *Counsel for Defendant Google LLC*

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **(OAKLAND DIVISION)**

17 KIMBERLY NEGRON, on behalf of herself and
18 all others similarly situated,

19 Plaintiff,

20 v.

21 GOOGLE LLC,

22 Defendant.

Case No. 4:21-cv-00801-HSG

**DECLARATION OF JUSTINA K.
SESSIONS IN SUPPORT OF
DEFENDANT GOOGLE LLC'S
ADMINISTRATIVE MOTION TO
CONTINUE CASE MANAGEMENT
CONFERENCE**

Judge: Hon. Haywood S. Gilliam, Jr.
Date: May 6, 2021
Time: 2:00 p.m.
Courtroom: 2, 4th Floor

1 I, JUSTINA K. SESSIONS, declare as follows:

2 1. I am a partner with the firm Wilson Sonsini Goodrich & Rosati, P.C., counsel of
3 record for Defendant Google LLC (“Google”). I am an attorney duly admitted to practice in the
4 State of California and before this Court. I make this declaration in support of Google’s
5 Administrative Motion to Continue Case Management Conference. I have personal knowledge of
6 the facts set forth below and, if called and sworn as a witness, I could and would testify
7 competently thereto.

8 2. On February 5, 2021, the Court set the initial Case Management Conference
9 (“CMC”) in this matter for May 11, 2021, with the Case Management Statement due by May 4,
10 2021. *See* Clerk’s Notice Setting Case Management Conference for Reassigned Civil Case, ECF
11 No. 13.

12 3. On March 23, 2021, following the submission of the parties’ stipulation, the Court
13 entered an Order Regarding Complaint Response Deadlines (as modified), ECF No. 23, setting (1)
14 Google’s deadline to respond to Plaintiff’s Complaint as June 4, 2021; (2) Plaintiff’s deadline to
15 respond to any motion to dismiss as August 3, 2021; and (3) Google’s deadline for any reply brief
16 as September 3, 2021.

17 4. On April 15, 2021, I met and conferred with Plaintiff’s counsel (Mr. Isquith, Sr.,
18 Mr. Isquith, Jr., Ms. Markert, and Ms. Baxter-Kauf). Mr. Isquith, Sr. indicated that Plaintiff’s
19 counsel had been contacted by several people and were considering filing additional complaints
20 that they would then seek to relate to this case. Mr. Isquith, Jr. stated that Plaintiff’s counsel
21 intended to substitute a new plaintiff in the place of Ms. Negron.

22 5. On April 21, 2021, I emailed Plaintiff’s counsel (Mr. Isquith, Jr., Ms. Markert, and
23 Ms. Baxter-Kauf), stating that Google intended to file a motion to continue the CMC.

24 6. On April 22, 2021, I met and conferred with Mr. Isquith, Jr., Ms. Markert, and Ms.
25 Baxter-Kauf. We discussed Google’s intention to move to continue the CMC. Plaintiff’s counsel
26 stated that they did not agree to Google’s request. We proceeded to discuss the matters required
27 in an initial CMC statement, including, *inter alia*, discovery, and case scheduling.

